

Puget Sound Air Pollution Control Agency

410 West Harrison Street, P.O. Box 9863 (206) 344-7330
Seattle, Washington 98109

March 6, 1979

Mr. R. F. Mitchell
Regional Environmentalist
Lone Star Industries, Inc.
2800 Campus Drive
San Mateo, CA 94403

Dear Mr. Mitchell:

Seattle Cement Plant - Particulate Emission Estimates

This letter is in response to your letter of February 28, 1979, commenting on our particulate study input parameters for Lone Star's Seattle cement plant. You stated in this letter that "the data for 1977 appears to us to be in order although we believe that the estimate for the clinker fugitive may be high since this building is enclosed on two sides." We believe that the particulate emission estimate used for the clinker storage fugitive is reasonable because:

1. Violation notices have been written for opacity emissions from the clinker storage shed.
2. EPA's "Technical Guidance for Control of Industrial Process Fugitive Particulate Emissions" (EPA-450/3-77-010, March 1977) indicates that clinker storage is one of the major potential sources of fugitive emissions at a cement plant. On page 2-292 the document reports that "partial enclosures are not sufficiently confining to prevent fugitive emissions from windage and loading/unloading activities".

Our estimate of 152 tons of particulate in 1977 from clinker storage fugitive is based on an estimate of 0.5 pound particulate per ton of clinker handled. The total amount of clinker handled in 1977 was given to us as 609,200 tons, of which 417,600 tons were imported.

For your reference, baghouse particulate emission rates were estimated on the basis of .01 grains per standard cubic feet of exhaust gas.

SERVING

KING COUNTY
410 West Harrison St.
P.O. Box 9863
Seattle, 98109
(206) 344-7330

KITSAP COUNTY
Dial Operator for Toll
Free Number Zenith 8385
Bainbridge Island, 98110
Dial 344-7330

PIERCE COUNTY
213 Hess Building
Tacoma, 98402
(206) 383-5851

SNOHOMISH COUNTY
(206) 259-0288

BOARD OF DIRECTORS

CHAIRMAN: Gene Lobe, Commissioner Kitsap County;
James B. Haines, Commissioner Snohomish County;
Harvey S. Poll, Member at Large;

Glenn K. Jarstad, Mayor Bremerton;
Charles Royer, Mayor Seattle;

William E. Moore, Mayor Everett;
John D. Spellman, King County Executive;

VICE CHAIRMAN: Patrick J. Gallagher, Commissioner Pierce County;
Mike Parker, Mayor Tacoma;
A. R. Dammkohler, Air Pollution Control Officer.

AGCS2M003388

Mr. R. F. Mitchell
March 6, 1979
Page 2

If you have any questions concerning these comments, please contact John Anderson by March 14, 1979. Otherwise, we will be using the input estimates originally submitted for your review on January 23, 1979.

Very truly yours,

A. R. Damkoehler
Air Pollution Control Officer

jk

cc: Lone Star Industries
Attn: L. B. Beckham
3801 East Marginal Way S.
Seattle, WA 98134